

UNITED STATES BANKRUPTCY COURT  
WESTERN DISTRICT OF TEXAS  
SAN ANTONIO DIVISION

IN RE:

KRISJENN RANCH, LLC, et al

Case No: 20-50805-rbk

Chapter 11

AMENDED  
**MOTION FOR ADMISSION PRO HAC VICE**

TO THE HONORABLE JUDGE OF SAID COURT:

Comes now Lynne B. Frank ("Applicant") moves  
this court to grant admission to the United States Bankruptcy Court for the Western  
District of Texas *pro hac vice* to represent William D. Kuhlmann, Jr. in this case,  
and Albert, Neely & Kuhlmann, L.L.P.  
and would respectfully show the Court as follows:

1. Applicant is an attorney and a member of the law firm (or practices under the  
name of)

Bruner & Bruner, P.C.,

with offices at

Mailing address: 3700 West 7th Street

City, State, Zip: Fort Worth, Texas 76107

Telephone: 817-332-6633 Fax: 817-332-6619

Email Address: LFrank@bjplaw.com

2. Since 11/1/13, Applicant has been and  
presently is a member of and in good standing with the Bar of the State of  
Texas. Applicant's bar license number is 24087215.

3. Applicant has been admitted to practice before the following state and federal courts:

Court:	Admission date:
<u>Texas State Courts</u>	<u>11/1/13</u>
<u>Texas Northern District</u>	<u>8/8/17</u>
<u>Texas Southern District</u>	<u>1/12/18</u>
<u> </u>	<u> </u>

4. Applicant is presently a member in good standing of the bars of the courts listed above, and is not currently suspended or disbarred in any other court, except as provided below (list any court named in the preceding paragraph before which Applicant is no longer admitted to practice):

None

\_\_\_\_\_

5. Applicant has never been subject to grievance proceedings or involuntary removal proceedings while a member of the bar of any state or federal court, except as provided below:

None

\_\_\_\_\_

6. Applicant is eligible to practice in the Bankruptcy Court.

7. Applicant has read and is familiar with the Local Rules of the Western District of Texas Bankruptcy Court and is also subject to all rules of practice of the U.S. District Court of the Western District of Texas and will comply with the standards of practice set out therein.

8. ☒ Applicant has not requested admission pro hac vice in the Bankruptcy Court for the Western District of Texas in the preceding twelve months.

or

☐ Applicant has filed the motions for admission pro hac vice in the preceding twelve months.

Case Name/Number	Date Filed	Disposition of Motion
_____	_____	_____
_____	_____	_____
_____	_____	_____

Wherefore, Applicant prays that this Court enter an order permitting the admission of Lynne B. Frank to the U.S. Bankruptcy Court Western District of Texas *pro hac vice* for this case only.

Respectfully submitted,



[Signature of Applicant]

Lynne B. Frank

[Printed name of Applicant]

3700 W. 7th Street Fort Worth, TX 76107

[Address of Applicant]

817-332-6633

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CERTIFICATE OF SERVICE

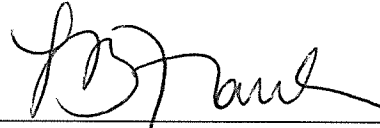
I hereby certify that I have served a true and correct copy of this motion upon each attorney of record and the original upon the Clerk of Court on this the 17th Day of December, 2021.

Note: Per Local Rule 9013(c)(2) the certificate of service must list each of the entities served and their addresses.

Attach a list below of each party served along with the service address and the method of service.

**The Parties listed on the attached Exh. A were served via the Court's ECF-Filing System.**

**A Proposed Order is attached hereto as Exh. "B"**



[Signature of Applicant]

Lynne B. Frank

[Printed name of Applicant]

3700 W. 7th Street Fort Worth, TX 76107

[Address of Applicant]

817-332-6633

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###

**20-50805-rbk** KrisJenn Ranch, LLC

**Case type:** bk **Chapter:** 11 **Asset:** Yes **Vol:** v **Bankruptcy Judge:** Ronald B. King  
**Date filed:** 04/27/2020 **Date of last filing:** 12/10/2021

## Attorneys

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**UNITED STATES BANKRUPTCY COURT**  
**WESTERN DISTRICT OF TEXAS**  
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IN RE:

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Case No: 20-50805-rbk

Chapter 11

**ORDER**

BE IT REMEMBERED that there was presented to the Court the motion for Admission *Pro Hac Vice* filed by Lynne B. Frank ("Applicant") and the Court, having reviewed the motion, has decided it is meritorious. ACCORDINGLY,

IT IS ORDERED that the Motion for Admission *Pro Hac Vice* is GRANTED, and

Applicant may appear on behalf of William D. Kuhlmann, Jr. in the above case.  
and Albert, Neely & Kuhlmann, L.L.P.

This order shall not be considered admission to practice generally before this Court or the U.S. District Court for the Western District of Texas.

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